

1 BELLSOUTH TELECOMMUNICATIONS, INC.
2 DIRECT TESTIMONY OF DAVID A. COON
3 BEFORE THE TENNESSEE REGULATORY AUTHORITY
4 DOCKET NO. 01-00362
5 JUNE 21, 2001
6

7 Q. PLEASE STATE YOUR NAME, YOUR POSITION WITH BELLSOUTH
8 TELECOMMUNICATIONS, INC. ("BELLSOUTH") AND YOUR BUSINESS
9 ADDRESS.
10

11 A. My name is David A. Coon. I am employed by BellSouth as Director –
12 Interconnection Services for the nine-state BellSouth region. My business
13 address is 675 West Peachtree Street, Atlanta, Georgia 30375.
14

15 Q. PLEASE PROVIDE A BRIEF DESCRIPTION OF YOUR BACKGROUND AND
16 EXPERIENCE.
17

18 My career at BellSouth spans over 21 years and includes positions in Network,
19 Regulatory, Finance, Corporate Planning, Small Business Services and
20 Interconnection Operations. Prior to my BellSouth employment, I performed a
21 variety of functions in the Network, Regulatory and Marketing Support
22 organizations of C&P Telephone Company-Washington. I have extensive
23 experience in the development and use of quantitative measurements and
24 results including the establishment, analysis and monitoring of BellSouth process
25 measures.

1 I received a Bachelors Degree in Civil Engineering from Ohio University and a
2 Masters Degree in Engineering Administration from George Washington
3 University. I received the Certified Management Accountant (CMA) designation
4 in 1996 from the Institute of Management Accountants.

5
6 ***I. EXECUTIVE SUMMARY***
7

8 Q. WHAT IS THE PURPOSE OF YOUR TESTIMONY?
9

10 A. The purpose of my testimony is to respond to several of the “not satisfied” and
11 “not complete” items from the third party test conducted in Georgia by KPMG.
12 Mr. Pate describes how that test was favorable for BellSouth, and responds to
13 the few “not satisfied” items that I do not address.
14

15 My testimony shows that certain KPMG findings in the Georgia test that I address
16 do not materially impact a Competitive Local Exchange Carrier’s (CLEC) ability to
17 compete in Tennessee.
18

19 Q. HOW MANY TESTS WERE CONDUCTED BY KPMG? OF THOSE TESTS,
20 HOW MANY WERE PASSED?
21

22 A. KPMG performed 1171 tests. Twenty of these tests were identified as “not
23 satisfied” and 25 were rated “not complete” by KPMG. The remaining 1126
24 (about 96%) were either satisfied or determined that no report was required.
25

1 Q. PLEASE PUT THE REMAINDER OF YOUR TESTIMONY IN PERSPECTIVE.

2
3 A. The remainder of my testimony provides detailed results of analyses conducted
4 by BellSouth on the results of KPMG's test criteria from Georgia that are "not
5 satisfied" or "not complete" in the final report. When reviewing these analyses, it
6 is critical to remember that the test criteria discussed herein are only dealing with
7 a small fraction of the test criteria that KPMG analyzed. The overwhelming
8 majority of KPMG's criteria were satisfied in the test. As described in Mr. Pate's
9 testimony, 1171 tests were conducted by KPMG. Of these tests, only 20 (less
10 than 2%) were identified as "not satisfied." KPMG did not complete work on 25
11 tests so they were rated "not complete" by KPMG. Work continues on these
12 criteria and they should ultimately fall into either the satisfied or not satisfied
13 classification. All of the remaining 1126 criteria (about 96%) were either satisfied
14 or KPMG determined that no report was required. When reviewing the detail in
15 my testimony, please do not be misled into believing the number of problems
16 was large. Mr. Pate describes the test conducted by KPMG in his testimony so I
17 will not repeat that explanation here.

18
19 Q. WHICH "NOT SATISFIED" ITEMS FROM THE GEORGIA THIRD PARTY TEST
20 DO YOU ADDRESS?

21
22 A. The "not satisfied" items that I address are:

- 23 • Timeliness of Functional Acknowledgement – EDI
- 24 • Timeliness of Rejects and Clarifications – EDI
- 25 • Timeliness of Firm Order Confirmations
- 26 • Accuracy and Timeliness of Partially Mechanized Orders, and

- Expected Responses – ADSL – Manual

The remaining “not satisfied” items, other than the four associated with metrics, are addressed by Mr. Pate.

Q. WHAT IS A “NOT SATISFIED” CRITERIA IN THE THIRD PARTY TEST?

A. When KPMG personnel performed their testing, they retested items that did not initially pass their test criteria until the item either passed the criteria, the test was determined not to be needed, or the test was closed. At the close of the test any items that had not passed KPMG’s test criteria, and for which no further testing was planned, were labeled “not satisfied” by KPMG. Where the Georgia Public Service Commission (GPSC) established standards for a particular measurement, KPMG used that standard to determine whether the test criteria was satisfied or not. Where no GPSC standard existed, KPMG established its own standard.

Q. PLEASE DESCRIBE THE TEST THAT KPMG PERFORMED FOR THE FIRST ITEM: TIMELINESS OF FUNCTIONAL ACKNOWLEDGEMENT – EDI.

A. As part of its third party test, KPMG performed a normal volume performance test and a peak volume performance test. The objective of these tests was to evaluate BellSouth's OSS performance associated with ordering at specified volumes. The normal volume performance test evaluated BellSouth's ability to accurately and quickly process orders using the EDI and TAG interfaces under

1 "normal" year-end 2001 projected load conditions. The peak volume
2 performance test evaluated BellSouth's ability to accurately and quickly process
3 orders using the EDI and TAG interfaces under "peak" year-end 2001 projected
4 transaction load conditions. The projected load conditions were based on region-
5 wide load factors, as the electronic interfaces are regional in nature. The results
6 for the TAG interface satisfied the criteria; however, during these two tests,
7 KPMG found that the EDI interface did not return functional acknowledgments in
8 a timely manner for fully mechanized orders (orders that flowed through without
9 manual handling) for Unbundled Network Elements (UNEs) (O&P 3-3-1 and O&P
10 4-3-1). The standard applied by KPMG in the test for the return of functional
11 acknowledgments was 95% of functional acknowledgments received in less than
12 30 minutes.

13
14 Q. YOU REFER TO O&P 3-3-1 AND O&P 4-3-1, PLEASE EXPLAIN WHAT THESE
15 REFER TO.

16
17 A. When KPMG performed its test, it assigned certain criteria using a unique
18 numbering scheme. One of the categories of the test was Ordering &
19 Provisioning, which KPMG identified as O&P in their numbering scheme. A
20 specific test within a category is identified by a specific number. For example,
21 O&P 3-3-1 and O&P 4-3-1 is assigned to a specific test by KPMG. For additional
22 information on the test, see Mr. Pate's testimony.

23
24 Q. WHAT IS A FUNCTIONAL ACKNOWLEDGEMENT IN EDI AND HOW IS IT
25 MEASURED?

1 A. Functional acknowledgments are transmitted between BellSouth and CLECs
2 using EDI for the purpose of notification. The receipt of any EDI transaction by
3 BellSouth or the CLEC requires an acknowledgment. The functional
4 acknowledgment indicates whether a transaction was accepted or rejected. In
5 the case of rejection, the nature of the error is also provided.

6
7 The timeliness of a functional acknowledgment for EDI is measured from the time
8 a document enters the EDI translator software until the functional
9 acknowledgment is transmitted to the CLEC. At the time KPMG performed the
10 normal volume performance and the peak volume performance tests, the
11 infrastructure for EDI limited the turnaround time for functional acknowledgments.
12 Specifically, the EDI architecture utilized by BellSouth's EDI system was only
13 capable of returning batches of data to CLECs within 90 minutes in a peak
14 volume environment at the time of the test. It is also worth noting that, at the time
15 of this test, no benchmark had been adopted by the Georgia Commission.
16 However, BellSouth had set its own internal standard at that time to return 75% of
17 functional acknowledgements within 90 minutes.

18
19 Q. PLEASE DESCRIBE WHETHER EDI FUNCTIONAL ACKNOWLEDGMENTS
20 ARE STILL AN ISSUE.

21
22 A. In January 2001, BellSouth upgraded the infrastructure for EDI in order to
23 shorten the response time capability of the interface. A sample of data from
24 March 9 to 23, 2001 shows that average response time for functional
25 acknowledgements was 1.14 minutes, and that BellSouth was returning 100% of

1 functional acknowledgements within 30 minutes for the upgraded EDI interface.

2
3 KPMG also tested the timeliness for functional acknowledgments for EDI during
4 KPMG's functional and production volume tests for orders for UNEs. During
5 these tests, KPMG did receive timely functional acknowledgements, and the
6 evaluation criteria (O&P 1-3-1 and O&P 10-3-1) for these tests were satisfied.
7 This means that the problem that KPMG encountered was limited to the peak
8 volume test. The EDI upgrade has corrected that problem.

9
10 For these reasons, BellSouth believes that the issues raised by these "not
11 satisfied" criteria have been corrected, and that BellSouth's actual performance
12 for functional acknowledgments returned via EDI for CLECs today should not
13 have a material adverse impact on their ability to compete.

14
15 Q. PLEASE DESCRIBE THE NEXT ITEM YOU LISTED: TIMELINESS OF
16 REJECTS AND CLARIFICATIONS – EDI.

17
18 A. As previously stated, KPMG performed functional tests of EDI. One objective of
19 the test was to evaluate the functionality of BellSouth's systems in processing
20 local service requests (LSRs) for UNEs and resale services. Specifically, KPMG
21 tested EDI to determine if this interface returned timely error information (fatal
22 rejects and auto clarifications) for fully mechanized LSRs, identified as MTP O&P
23 1-3-2a and STP PO&P 11-3-2a in KPMG's Report. In the test, KPMG required
24 97% of fully mechanized errors to be received within one hour.

1 Q. WHAT WERE KPMG'S RESULTS?

2
3 A. In the initial test of UNE orders, KPMG received 18% of fully mechanized errors
4 in one hour. During a retest of UNE orders in January 2001, performance
5 improved to 84% of fully mechanized errors received within one hour. In
6 addition, another 5% were received within two hours. For resale services,
7 KPMG's results for the initial test was 9% of fully mechanized errors received in
8 less than one hour. During KPMG's retest of resale services orders in January
9 2001, KPMG received 85% of the fully mechanized errors within one hour.
10 Another 8%, for a total of 93%, were received within two hours.

11
12 Q. WHAT WERE THE RESULTS OF BELL SOUTH'S ANALYSIS?

13
14 A. As part of its analysis on these criteria, BellSouth investigated 16 out of 235
15 orders, 11 for resale services and 5 for UNEs. BellSouth found that, although
16 KPMG was supposed to submit only orders that flowed-through BellSouth's
17 systems in this test, three of the orders fell out for manual handling, therefore
18 delaying the return of the error information. These three orders fell out because
19 KPMG made errors. Another order that KPMG believes it sent could not be
20 located after considerable searching and BellSouth believes this order may not
21 have been sent. According to BellSouth's records, BellSouth returned the error
22 information for one of the other orders within 45 minutes, which is clearly within
23 the one-hour interval. BellSouth found the error information was indeed delayed
24 for three of the sixteen orders because of EDI routing and mapping problems.
25 These EDI routing and mapping problems have been resolved by software

1 changes.

2
3 BellSouth does agree that the remaining eight orders received delayed
4 responses. As discussed previously, in January 2001, BellSouth upgraded EDI
5 enabling it to return fatal rejects and clarifications faster. This upgrade would
6 have allowed four of the eight orders to receive timely responses had KPMG sent
7 them after the upgrade to EDI. Three of the remaining four test responses in this
8 criteria were delayed because of the downstream LEO system. At the time of the
9 test, a few CLECs were making unusual and large queries, which slowed LEO's
10 response times. In March 2001, BellSouth modified LEO so that it now is able to
11 process large queries and send faster responses. The remaining response was
12 delayed because of a LEO outage.

13
14 Given the changes BellSouth has made and the necessary modifications to
15 KPMG's test, the number of orders that would not pass KPMG's test would be
16 much lower today. These improvements are clearly evident in BellSouth's
17 commercial performance results.

18
19 Q. WHAT DOES BELLSOUTH'S COMMERCIAL PERFORMANCE
20 DEMONSTRATE?

21
22 A. BellSouth's actual commercial performance in this area shows that it is returning
23 error and clarification information to CLECs in a timely manner. For Georgia, in
24 February 2001, BellSouth returned 97.21% of the rejects for resale residential
25 LSRs, 98.28% of the rejects for resale business LSRs, 97.56% of the rejects for

1 "other" LSRs and 100% of the rejects for LNP within one hour, exceeding the
2 benchmark used by KPMG in the test. In April 2001, BellSouth returned 95.15%
3 of the rejects for resale residential LSRs, 100% of the rejects for resale business
4 LSRs and 98.49% of the rejects for loop and port combinations.

5
6 Q. PLEASE DESCRIBE THE NEXT TEST: TIMELINESS OF FIRM ORDER
7 CONFIRMATIONS – TAG.

8
9 A. The next "not satisfied" condition concerns KPMG's functional test of the TAG
10 interface (O&P 2). One area that KPMG evaluated was whether TAG provided
11 timely firm order confirmations (FOCs) for flow-through orders for UNEs (O&P 2-
12 3-3a). The benchmark that KPMG used for this measure is that 95% of FOCs for
13 flow-through orders must be returned within three hours.

14
15 During a retest in January 2001, KPMG tested 45 orders in this category. Of
16 those orders, KPMG received 84% (38 orders) of FOCs for orders submitted via
17 TAG within 3 hours. The seven orders that did not receive FOCs within 3 hours
18 fell out for manual handling. In fact, FOCs for five of these seven orders were
19 received within 24 hours. These seven orders were partially mechanized orders;
20 however, KPMG treated them as fully mechanized orders. The delays in
21 providing FOCs for these orders occurred because they were designed to fall out
22 of the mechanized system for manual handling. These seven orders should have
23 been excluded from this test, as they were not fully mechanized orders and
24 KPMG's benchmark only applied to mechanized orders. Had these seven orders
25 been excluded, 100% of the FOCs for orders submitted in the test would have

1 been received within three hours.

2
3 Q. PLEASE DISCUSS WHETHER FOC TIMELINESS FOR TAG IS STILL AN
4 ISSUE.

5
6 A. Although KPMG did not perform another functional test of TAG, it did perform
7 normal volume, peak volume, and production volume tests of TAG. During these
8 tests, BellSouth returned timely FOCs via TAG. These evaluation criteria (O&P
9 3-3-4, O&P 4-3-4, and O&P 10-3-4) are satisfied in KPMG's report.

10
11 BellSouth's actual commercial performance for CLECs in this area has shown
12 significant improvement, and demonstrates that BellSouth currently is returning
13 FOCs in a timely manner. For Georgia, in April 2001, BellSouth returned 97.50%
14 of the FOCs for resale residential orders, 98.40% of the FOCs for resale
15 business, and 97.12% of the FOCs for UNE combos within three hours, clearly
16 exceeding KPMG's benchmark.

17
18 Q. PLEASE DESCRIBE THE NEXT AREA: ACCURACY AND TIMELINESS OF
19 PARTIALLY MECHANIZED ORDERS.

20
21 A. Orders for certain complex resale services and UNEs may be transmitted
22 electronically via EDI or TAG, but are designed to fall out for manual handling. In
23 order to enable CLECs to submit some complex LSRs electronically, rather than
24 by fax or mail, BellSouth designed the EDI and TAG ordering interface to accept
25 LSRs for these services. After these LSRs are transmitted to BellSouth

1 electronically, they are handled as if they had been faxed or mailed to the Local
2 Carrier Service Center (LCSC). These orders are sometimes referred to as
3 "partially-mechanized." KPMG's report shows 10 "not satisfied" evaluation
4 criteria for tests involving partially mechanized orders. The "not satisfied" criteria
5 for partially mechanized orders can be divided into two areas: accuracy and
6 timeliness. I will discuss both areas.

7
8 Q. PLEASE DESCRIBE HOW PARTIALLY MECHANIZED ORDERS ARE
9 HANDLED.

10
11 A. Partially mechanized orders are processed by service representatives in
12 BellSouth's LCSC just like manually-submitted orders. The LCSC now consists
13 of three locations due to the volume of orders. For the year 2000, the LCSC
14 processed an average of 99,122 manual and partially mechanized LSRs per
15 month.

16
17 Currently, there are 948 BellSouth employees in the LCSC, including the 780
18 service representatives who process the manual and partially mechanized LSRs.
19 From December 1998 through November 2000, the LCSC increased its trained
20 service representative headcount by 130% to the 780 that are employed today.
21 BellSouth has continuously increased the work force and productivity of the
22 LCSC to meet actual and forecasted demand, increasing complexity of the
23 orders being worked, and tighter processing requirements, such as the
24 benchmarks for returning FOCs, rejects, and clarifications.

1 Q. HOW HAS BELL SOUTH ADDRESSED IMPROVEMENT IN THIS AREA?

2
3 A. As a result of the LCSC's growth in personnel, the increased complexity of the
4 orders handled by the LCSC service representatives, and the tighter benchmarks
5 for performance, BellSouth recognized the need to improve the accuracy and
6 timeliness of its handling of partially-mechanized orders. BellSouth has
7 established a group within the LCSC to improve accuracy and timeliness, which
8 is called the "Quality and Accuracy Team" which is now composed of
9 approximately 35 people. The purpose of the team is to support the LCSC in
10 achieving higher levels of accuracy that lead to increased efficiency, improved
11 flow through, increased customer satisfaction, and fewer complaints, expedites,
12 and escalations. For example, the team has helped the LCSC improve the
13 handling of LSRs that drop out for manual handling due to errors. The LCSC
14 monitors the progress of these LSRs using a daily report. From September 1,
15 2000, when the team began its work, to March 28, 2001, there were 92% fewer
16 LSRs on the daily report. Currently, the average number of days it takes to clear
17 them is 4 or less.

18
19 The team identifies problems by closely monitoring the work at the LCSC and
20 looking for trends. If, for example, repeat problems are caused by an LCSC
21 service representative, the representative will be coached by the team. If the
22 problems are caused by a CLEC, the team works with that CLEC's customer
23 service manager who will contact the CLEC and propose corrections.

24
25 Another way to increase accuracy and timeliness for partially mechanized orders

1 is to reduce the amount of manual handling involved in processing them.

2 Although not always practical, the surest solution, of course, is to increase the
3 number of LSRs that flow through the systems rather than fall out for manual
4 handling. With this in mind and as a result of the Georgia Commission's Order of
5 January 12, 2001 in Docket No. 7892-U, BellSouth and the CLECs formed a
6 cooperative "flow through improvement task force." The objective of the task
7 force is to enhance the flow through of electronic orders, document those
8 enhancements, and develop a schedule for implementing the enhancements.
9 The task force is operating as a subcommittee of the Change Control Process
10 (CCP) as discussed in Mr. Pate's initial testimony in this docket. The CLECs and
11 BellSouth first discussed the formation of the task force at the regularly-
12 scheduled monthly status meeting of the CCP on February 28, 2001. The first
13 meeting of the task force occurred on March 19, 2001.

14
15 Q. WHAT DOES BELL SOUTH'S RECENT PERFORMANCE INDICATE
16 REGARDING ACCURACY AND TIMELINESS FOR PARTIALLY-MECHANIZED
17 ORDERS?
18

19 A. According to BellSouth's performance measurements results for Invoice
20 Accuracy, these partially mechanized issues do not have a disproportionate
21 impact on CLEC customers. The invoice accuracy results for Georgia for April
22 2001 were better for CLECs than for BellSouth, yielding 99.75% accuracy.

23 Q. PLEASE DESCRIBE THE NEXT TEST: EXPECTED RESPONSES – ADSL –
24 MANUAL.
25

26 A. KPMG performed a functional evaluation of the pre-ordering and ordering

1 processes for xDSL products as delivered to CLECs through BellSouth's manual
2 processes (PO&P 12). Specifically, KPMG tested BellSouth's ability to provide
3 the expected responses (PO&P 12-2-1). KPMG's standard is that 99% of the
4 expected responses should be received by the CLEC.

5
6 Q. WHAT WERE KPMG'S RESULTS?

7
8 A. Of the 1,006 total transactions that KPMG submitted, 951 (94.5%) received the
9 appropriate responses from BellSouth. Specifically, KPMG submitted 447 pre-
10 order loop makeup service inquiries and LSR service inquiries to BellSouth's
11 Complex Resale Support Group (CRSG) via e-mail. KPMG received 417
12 acknowledgments (93%) for these transactions. In addition, KPMG sent 559
13 total pre-order loop make-up service inquiries and LSR service inquiries via
14 facsimile. Of the 275 loop makeup service inquiries that KPMG submitted via
15 facsimile, 252 (92%) received the subsequent expected responses (confirmation
16 or error) from BellSouth. As a result, KPMG issued Exception 134. For the 284
17 LSR service inquiries that KPMG submitted via facsimile, 282 (99%) received the
18 expected responses (FOCs, rejects, or clarifications), which met KPMG's
19 standard.

20
21 Q. WHAT DID BELL SOUTH FIND REGARDING KPMG'S RESULTS?

22
23 A. In Exception 134, KPMG identified 55 transactions where they did not receive the
24 expected response. BellSouth's investigation of those 55 pre-order loop makeup
25 service inquiries and order LSR service inquiries that KPMG claimed did not

1 receive the expected responses is as follows:

- 2
- 3 • Three of the inquiries, purchase order numbers X1P16, X002A10019, and
- 4 X031A10117, were acknowledged.
- 5 • One transaction was recalled before BellSouth could do anything with it.
- 6 • Twenty-two of the inquiries were rejected. Because KPMG should have
- 7 considered a rejection to be an acknowledgment that BellSouth received
- 8 the inquiry, KPMG should not have expected additional acknowledgments
- 9 for the 22 transactions that BellSouth rejected. BellSouth believes that it
- 10 handled these 22 transactions correctly. Nevertheless, on March 22,
- 11 2001, BellSouth changed its process. Now when BellSouth sends an e-
- 12 mail rejection, it also states that it is acknowledging the inquiry.
- 13 • Four inquiries, that KPMG state were not acknowledged, according to
- 14 BellSouth's records were never received by BellSouth.
- 15 • On six inquiries KPMG erroneously expected a FOC. BellSouth disagreed
- 16 because these orders were rejected back to KPMG. Because KPMG did
- 17 not resolve these errors and return the orders to BellSouth, KPMG should
- 18 not have expected FOCs. BellSouth believes that it handled these 6
- 19 inquiries correctly.
- 20 • Two of the loop makeup service inquiries where expected FOCs ere never
- 21 received by BellSouth according to BellSouth records.
- 22 • Two loop makeup service inquiries were labeled "version 01." When a
- 23 CLEC issues an LSR, the CLEC assigns a Purchase Order Number
- 24 (PON). If the LSR must be modified, the CLEC will simply increment the
- 25 version number instead of issuing a new PON. BellSouth's records show

1 that it did not receive these, although KPMG may have sent them as
2 "version 00."

- 3 • BellSouth investigated 13 loop makeup service inquiries for which KPMG
4 received the makeup information, but no prior FOC from the LCSC. On 12
5 inquiries BellSouth erroneously sent the loop makeup information to
6 KPMG before the LCSC sent the corresponding FOCs. 1 loop makeup
7 service inquiry was cancelled by the LCSC because the LCSC returned
8 the related LSR to KPMG for clarification. Because KPMG had not
9 resolved the problems with the LSR in a timely manner, the LCSC properly
10 canceled it. This process is outlined in the LEO Guide, volume 1. On
11 February 5, 2001, BellSouth changed its process whereby the loop
12 makeup information is not sent to a CLEC until after the FOC has been
13 generated. This resolved the issues encountered in handling these
14 orders.
- 15 • Finally, KPMG believed that 2 LSR service inquiries should have received
16 subsequent responses (FOCs, clarifications, or rejects) from BellSouth.
17 BellSouth disagreed because it sent KPMG a clarification for one LSR
18 service inquiry. As discussed above, because KPMG should have
19 considered a clarification to be an acknowledgment that BellSouth
20 received the inquiry, KPMG should not have expected an acknowledgment
21 for this inquiry. BellSouth's records show that it did not receive the other
22 LSR service inquiry, although KPMG may have sent it with a different
23 version number.

24
25 Q. WHAT DOES BELLSOUTH'S ANALYSIS INDICATE?

1 A. After analyzing these 55 transactions, BellSouth believes that only 12
2 transactions, the 12 inquiries for which the CRSG sent the loop makeup
3 information to KPMG before the LCSC sent the corresponding FOCs, did not
4 receive the expected responses. Therefore, 98.81% of the transactions received
5 the expected responses, which, rounded, meets KPMG's standard. In addition,
6 BellSouth believes that the changes and modifications it has made for handling
7 the responses to these inquiries should prevent any material adverse impact on
8 competition.

9
10 Q. TURNING TO THE "NOT COMPLETE" CRITERIA FROM KPMG'S TEST, WHAT
11 DOES YOUR TESTIMONY ADDRESS?

12
13 A. Now, I will address the criteria labeled as "not complete" by KPMG. All of these
14 criteria were in the part of the test dealing with performance measurements.

15
16 Q. WHAT ARE "NOT COMPLETE" CRITERIA?

17
18 A. A "not complete" occurred, when the third party test was closed, but some test
19 criteria had not been completed by KPMG. Work continues on those criteria and
20 KPMG is expected to issue a supplemental report indicating whether these
21 remaining criteria were satisfied.

22
23 Q. PLEASE DESCRIBE THE FIRST THREE "NOT COMPLETE" CRITERIA THAT
24 YOU ADDRESS: PERCENT REJECTED SERVICE REQUESTS, REJECT
25 INTERVALS AND FIRM ORDER CONFIRMATION TIMELINESS.

1 A. The first set of “not complete” conditions concern the Ordering and Provisioning
2 Performance Measures Evaluation (O&P – 7). This evaluation provided for “(1)
3 Calculation and Reporting Validation, and (2) Data Comparison, for ordering and
4 provisioning-related Service Quality Measures (SQMs) produced by BellSouth.”

5
6 For O&P 7-1-3 (Percent Rejected Service Requests), O&P 7-2-3 (Reject
7 Interval), and O&P 7-3-3 (Firm Order Confirmation Timeliness), KPMG compared
8 Hewlett Packard-provided data to the corresponding BellSouth raw data for the
9 months of August 2000 – November 2000. KPMG found discrepancies in time
10 stamps for LSRs Sent/Received, Reject/Clarification Requested, and FOC for the
11 TAG and EDI interfaces and issued Draft Exceptions 176 and 178 to BellSouth.

12
13 Draft Exception 176 identified six discrepancies for the EDI interface. BellSouth
14 responded to the exception on March 12, 2001:

- 15
- 16 • Two discrepancies were due to incorrect test procedures on the part of
 - 17 KPMG.
 - 18 • Four discrepancies were unresolved, as information identifying the causes
 - 19 of the delays was no longer available. Because of this, BellSouth
 - 20 requested KPMG to test the most recent month's data.
- 21

22 Draft Exception 178, based on October 2000 and November 2000 data, identified
23 a total of nineteen discrepancies for the EDI and TAG interfaces. BellSouth
24 responded to the exception on March 23, 2001 as follows:

25

- Eleven discrepancies were due to incorrect test procedures on the part of KPMG. For example, KPMG sent multiple instances of the same PON/version combination. Only one instance is permitted. Another example was where KPMG was not available to resolve the data when BellSouth had it ready, but KPMG recorded the time when they received it.
- Three discrepancies were due to errors in BellSouth data. BellSouth was not accurately capturing the timestamp when FOCs were sent manually. Corrective measures were implemented in January 2001.
- Five discrepancies were unresolved, as information identifying the causes of the delays was no longer available.

For each case where historical information was available for analysis, BellSouth either found no discrepancies in time stamps, or implemented corrective measures to address the issues.

Q. CAN YOU EXPLAIN THE PROCESS FOR RESPONDING TO THE OCTOBER 2000 DATA?

A. Data is not available until some time after the end of the data month. KPMG first must assimilate and review the data to determine if a problem occurred. If so, KPMG will issue an observation. If KPMG believes a problem exists, it will issue a Draft Exception and allow BellSouth time to review the process and/or data to determine the cause and take corrective action. In many instances, BellSouth and KPMG can resolve the issue and the Draft Exception will be cleared and go away. However, in some instances, KPMG and BellSouth may disagree on the

1 resolution. If so, KPMG will file the Exception with the GPSC and BellSouth will
2 simultaneously file a response to the Exception with the GPSC. If, at a later
3 time, KPMG agrees with and/or accepts BellSouth's response, KPMG will amend
4 the Exception filed with the GPSC. Sometimes this process can be resolved
5 more quickly than others.

6
7 Q. PLEASE DESCRIBE THE "NOT COMPLETE" CRITERIA FOR THE TWO
8 MEASURES: AVERAGE JEOPARDY NOTICE INTERVAL AND PERCENTAGE
9 OF ORDERS GIVEN JEOPARDY NOTICES (O&P 7-6-3).

10
11 A. This set of "not complete" conditions concern O&P 7-6-3 (Average Jeopardy
12 Notice Interval and Percentage of Orders Given Jeopardy Notices). In this test,
13 KPMG issued Exception 128 for one service order in the month of October 2000,
14 where the KPMG-collected value for "completion date" did not match the
15 BellSouth-reported value. BellSouth submitted a response to this exception on
16 March 13, 2001.

17
18 BellSouth concluded that this discrepancy was due to a business rule in the
19 "Service Order Communication System (SOCS) daily fixed fielded extract," a
20 standard extract of data from SOCS that feeds all downstream systems. In
21 certain instances, the final disposition of a service order is not updated in the
22 extract to allow the appropriate changes in PMAP.

23
24 Q. EXPLAIN WHAT STEPS BELL SOUTH HAS TAKEN TO RESOLVE THIS ISSUE.
25

1 A. To resolve this issue, BellSouth is in the process of building another extract from
2 SOCS that duplicates the original one but removes all business rules and extracts
3 every service order in SOCS each time it is run. An initial estimate for completing
4 this work is under development, and implementation is expected to take a
5 minimum of eight weeks.

6
7 Q. WHAT WAS THE OBJECTIVE OF THE NEXT SECTION OF NOT COMPLETE
8 CRITERIA: DATA COLLECTION AND STORAGE VERIFICATION AND
9 VALIDATION REVIEW (PMR 1)?

10
11 A. This “not complete” condition concerns the Data Collection and Storage
12 Verification and Validation Review (PMR 1). The objective of this review was to
13 evaluate the key policies and procedures for collecting and storing both the raw
14 data that BellSouth uses to create SQM reports and the preliminary data that
15 BellSouth uses to produce the raw data.

16
17 Q. PLEASE DESCRIBE KPMG’S ASSERTION THAT BELL SOUTH DID NOT
18 PROVIDE SUFFICIENT DATA FOR CREATING HISTORICAL SQM REPORTS.

19
20 A. This “not complete” condition is identified as PMR 1-2-1 in the Report. KPMG
21 reported that BellSouth did not provide sufficient data for re-creating any prior
22 month's historical SQM report. It suggested that the raw data, early-stage data,
23 and the SQM reports be retained for a sufficient length of time to support any
24 audits that might be required by the GPSC. KPMG reported its findings in
25 Exception 79.

1 Q. WHAT WAS BELL SOUTH'S RESPONSE TO KPMG'S FINDINGS?

2
3 A. BellSouth provided its latest response to this exception on March 6, 2001, in
4 which it proposed the following data retention policy:

5 "It is the policy of BellSouth Performance Measurements to retain the
6 early-stage data for a period of eighteen months to facilitate detailed
7 audits of PMAP reports. 'Early-stage data' is defined as that which is
8 extracted from source systems (CABS, CRIS, EXACT, WFA, SOCS,
9 LMOS, etc.) and maintained as ASCII flat files for the purpose of
10 generating SQM reports. 'Early-stage' data is further defined as source
11 system data that is transmitted manually for said purpose. The
12 mechanical flat files and the manual files of early-stage data will be
13 retained for a period of eighteen months."

14
15 "BellSouth will retain PMAP raw data for a minimum of three years.
16 'PMAP raw data' is defined as that which is available for download for the
17 current month from the BellSouth website. Further, BellSouth will retain
18 for three years the monthly aggregate database, i.e., that which has been
19 processed and normalized from raw data, and the resources necessary to
20 re-create the SQM reports from that database."

21
22 BellSouth believes that implementation of this policy, combined with current data
23 retention practices, allows a full and complete opportunity to audit BellSouth's
24 performance results in a meaningful way.
25

1 Q. PLEASE DESCRIBE THE NEXT AREA WHERE TEST RESULTS ARE NOT
2 COMPLETE: METRICS DEFINITION DOCUMENTATION AND
3 IMPLEMENTATION VERIFICATION AND VALIDATION REVIEW (PMR 2).
4

5 A. Next, KPMG had “not complete” conditions in the Metrics Definition
6 Documentation and Implementation Verification and Validation Review (PMR 2).
7 This review evaluated the definitions of the SQMs and the associated
8 descriptions of the calculations in the October 22, 1999, version of BellSouth's
9 Georgia SQM documentation.
10

11 Q. WHAT WERE THE FIRST SET OF FINDINGS UNDER PMR 2?
12

13 A. The first group of findings were identified as PMR 2-2-3, 2-2-4, 2-21-3 and 2-21-
14 4. In Exception 133, KPMG found that BellSouth did not compute its OSS
15 Interface Availability SQM in accordance with the definitions and business rules
16 that appear in the *Service Quality Measurements Georgia Performance Reports*
17 (*SQM Reports*) for Pre-Ordering and Maintenance and Repair.
18

19 Q. WHAT ENHANCEMENTS HAS BELL SOUTH MADE TO TRACK AND
20 MEASURE OSS PERFORMANCE?
21

22 A. BellSouth agreed that the definitions and business rules in the Georgia SQMs for
23 Interface Availability (OSS-2 and OSS-3) were not worded such that the intended
24 interpretation was clear. BellSouth has rewritten the definitions and business
25 rules and has submitted them to KPMG for their review. Once closure on this

1 exception is reached, BellSouth will incorporate the clarified definitions and
2 business rules into the SQM which will satisfactorily close this test.

3
4 Further, BellSouth indicated that an internal analysis of performance data
5 revealed that not all assets had been appropriately mapped to Renaissance
6 Enterprise Management (REM), the tool used to compile trouble report data.
7 BellSouth subsequently corrected January data and implemented the following
8 plan of action to ensure future compliance:

- 9
- 10 • Completed detailed review of REM assets and linkages to applications
 - 11 • Established additional linkages, where appropriate
 - 12 • Established procedure for reporting transport outages directly associated
13 with specific applications
 - 14 • Enhanced Project Management Organization (PMO) to better manage the
15 internal change control process
 - 16 • Dedicated resources to manage business requirements
 - 17 • Established a process for monthly review of REM assets
 - 18 • Established a process for periodic internal audits
 - 19 • Established a process for monthly reconciliation of CLEC-reported and
20 REM-reported outages.
- 21

22 Q. PLEASE EXPLAIN THE OTHER GROUP OF "NOT COMPLETE" CRITERIA
23 UNDER PMR 2.

24
25 A. The next criteria are identified as PMR 2-4-2, 2-4-3, 2-5-2 and 2-5-3. In
26 Exception 122, KPMG stated that "Definitions and Business Rules in the *Service*

1 *Quality Measurements Georgia Performance Reports (SQM Reports)* are
2 incomplete or inaccurate for the FOC Timeliness and Reject Interval Ordering
3 Service Quality Measurements."

4
5 KPMG indicated that time stamps from EDI, LENS, and TAG should be used in
6 the calculation of these measurements as per the business rules. However,
7 KPMG found that time stamps from the LEO system are used in such
8 calculations. Program change requests have been scheduled that will enable
9 BellSouth to capture time stamps from EDI, LENS, and TAG for calculation of the
10 FOC and reject intervals. Even though the time stamps will move such that
11 responses will take longer, BellSouth expects to meet the performance
12 benchmark.

13
14 Q. PLEASE DESCRIBE THE METRIC DATA INTEGRITY VERIFICATION AND
15 VALIDATION REVIEW (PMR 4) OF THE KPMG REPORT.

16
17 A. KPMG had "not complete" criteria on the Metrics Data Integrity Verification and
18 Validation Review (PMR 4). This review evaluated the accuracy and
19 completeness of the SQM raw data produced by BellSouth during recent months.
20 The evaluation also assessed the adequacy and completeness of the related
21 data transfer process and the internal controls on the processes.

22
23 Q. For PMR 4-1-1, KPMG STATED THAT THE RAW DATA USED IN THE
24 CALCULATION OF BELL SOUTH SQM REPORTS ARE NOT ACCURATELY
25 DERIVED FROM OR SUPPORTED BY THEIR COMPONENT EARLY-STAGE

1 DATA. CAN YOU EXPLAIN THESE DISCREPANCIES?

2
3 A. One “not complete” criterion is identified as PMR 4-1-1 in the Report. In
4 Exception 89.3, KPMG stated that "raw data used in the calculation of BellSouth
5 SQM reports are not accurately derived from or supported by their component
6 early-stage data" for OSS Response Interval – Pre-Ordering.

7
8 BellSouth provided an amended response to this exception on February 23,
9 2001. It was determined that the discrepancies were due to invalid negative
10 numbers generated by middleware used by LENS, TAG, RNS, and ROS to
11 produce the measure. Source system teams are currently working to correct or
12 eliminate generation of these invalid values. BellSouth estimates that
13 implementation of the required changes will be completed by third-quarter 2001.

14
15 Although BellSouth does not dispute these discrepancies, the magnitude of the
16 differences is minute, as demonstrated in the table below.

17

Discrepancy Grouping	<u>Difference</u>
Total Number of Accesses	0.021%
Total Access Time in Milliseconds	0.060%
Total Number of Access > Six Seconds	0.068%

18
19 The small differences reflected in the above table should not have a material
20 impact on competitors or competition.

1 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON THE
2 NEXT SET OF NOT COMPLETE CRITERIA UNDER PMR 4?

3
4 A. The next set of "not complete" criteria is identified as PMR 4-3-1, 4-3-2,
5 4-4-1, 4-4-2, 4-5-1 and 4-5-2 in the Report. KPMG stated in Exception 131 that
6 "BellSouth's raw data used in the calculation of the BellSouth Ordering SQM
7 reports is not accurately derived from or supported by its component early-stage
8 data" for Percent Rejected Service Requests, Reject Interval, and FOC
9 Timeliness.

10
11 In a response provided to KPMG on February 23, 2001, BellSouth clarified 23 of
12 the 24 PON discrepancies with valid business and technical explanations. The
13 remaining PON discrepancy was due to the inability of BellSouth's performance
14 measurement system to properly capture FOC timestamps for orders in LEO with
15 manual FOCs. A program change was implemented on February 1, 2001 to
16 address this issue. KPMG is reevaluating these test criteria, using data for
17 February 2001. An amended response was sent on April 30, 2001, that
18 fundamentally responded to all the re-evaluating of this test criteria.

19
20 For the month tested, October 2000, only 0.97% of the LSRs received in LEO
21 were given a manual FOC. Therefore, the impact on reported results and on
22 local competitors is negligible.

23
24 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON ITEM
25 PMR 4-13-1?

1 A. KPMG could not replicate the BellSouth-reported SQMs for Percent Provisioning
2 Troubles within 30 Days of Service Order Activity, as stated in Exception 86.1.
3 Therefore, it could not validate the accuracy and completeness of the associated
4 raw data, as defined by PMR 4-13-1. Upon successful closure of Exception 86.1,
5 KPMG will reevaluate this test criterion.

6
7 Change requests to correct the irregularities associated with Percent
8 Provisioning Troubles within 30 Days of Service Order Activity in PMAP were
9 implemented in March 2001. KPMG successfully replicated November 2000 and
10 December 2000 data by simulating the programming changes. Retesting will be
11 conducted on a recent month's data.

12
13 Q. WHAT WERE KPMG'S FINDINGS AND BELL SOUTH'S RESPONSE ON PMR
14 4-38-1 AND 4-39-1?

15
16 A. The next set of "not complete" criteria is PMR 4-38-1 and 4-39-1. In Exception
17 89.2, KPMG states that "raw data used in the calculation of BellSouth SQM
18 reports are not accurately derived from or supported by their component early-
19 stage data" for the Trunk Group Service Report and the Trunk Group Service
20 Detail.

21
22 For the test month of September 1999, BellSouth and KPMG results for the
23 CLEC aggregate and BellSouth Retail varied an average of 1.72% and 1.21%,
24 respectively. These discrepancies, therefore, should have no material impact on
25 local competition.

1
2 KPMG found that BellSouth-reported derived raw data values do not agree with
3 the KPMG-calculated values for these measurements. BellSouth implemented a
4 program change in January 2001, to address the cause of the discrepancies
5 identified.

6
7 Q. PLEASE DESCRIBE THE LAST AREA: CALCULATION AND REPORTING
8 VERIFICATION AND VALIDATION REVIEW (PMR 5) WHERE NOT
9 COMPLETE CRITERIA REMAIN.

10
11 A. The last set of “not complete” criteria involved the Calculation and Reporting
12 Verification and Validation Review (PMR 5). This review evaluated the accuracy
13 of the information produced by BellSouth's SQM report production processes. In
14 this evaluation, KPMG determined whether BellSouth's SQM calculations were
15 accurately reported for the aggregate of all CLECs and for BellSouth retail in
16 October 1999. KPMG based its evaluations on the raw data and computation
17 instructions provided by BellSouth. This evaluation complemented the related
18 Performance Measures Evaluation conducted under the *Master Test Plan*, which
19 focused on the SQMs reported for the KPMG test CLEC for all months of the
20 transaction-testing period.

21
22 Q. WHAT WERE KPMG’S COMMENTS AND BELL SOUTH’S RESPONSE IN THIS
23 AREA?

1 A. The "not complete" criterion is PMR 5-11-2 in KPMG's Report. KPMG stated in
2 Exception 86.1 that it could not replicate "BellSouth's reported SQMs." This
3 included Percent Provisioning Troubles within 30 days of Service Order Activity in
4 the provisioning non-trunks category for the CLEC Aggregate and BellSouth
5 Retail.

6
7 Program change requests to correct the irregularities associated with Percent
8 Provisioning Troubles within 30 Days of Service Order Activity in PMAP were
9 implemented in March 2001. KPMG successfully replicated November 2000 and
10 December 2000 data by simulating the programming changes. Retesting will be
11 conducted on a recent month's data.

12
13 Q. PLEASE DESCRIBE THE STATISTICAL EVALUATION OF TRANSACTIONS
14 TEST METRICS INCLUDED IN THE KPMG SUPPLEMENTAL TEST REPORT.

15
16 A. Section F of the Supplemental Test Plan Final Report addresses KPMG's test to
17 evaluate BellSouth's service performance for KPMG's test CLEC using statistical
18 methods to compare BellSouth's performance for CLECs' standards established
19 in July 2000 by the Georgia PSC. The actual data tested was for the months of
20 December 1999 and January – February 2000. Obviously, the standards were
21 set about six months after the data was collected. As a result, not surprisingly,
22 this comparison revealed issues that have been addressed and corrected over
23 time, as will be shown below.

1 Table VIII-6.1 in Section F.2.3 of the Report provides a Test Cross-Reference for
2 the criteria used in the metrics evaluation with Table VIII-6.3 in Section F.3.1
3 providing the result and comments for that evaluation. My comments will
4 address the sections that are listed with “Not Satisfied” results. Table VIII-6.4 of
5 the Report provides the Detail of Results for Resale criteria. Table VIII-6.5
6 shows the Detail of Results for UNE evaluation. Table VIII-6.6 provides the Detail
7 of Results (Other). I will refer to the appropriate item number of each section
8 from the report with my comments.

9
10 KPMG listed their results in 10 groupings (6-1-1 to 6-1-4, 6-2-1 to 6-2-4, and 6-3-
11 1 to 6-3-2 with 6-3-2 not completed) and established their own criteria that 90%
12 of the individual tests would have to meet or exceed the standards effective in
13 Georgia in July 2000 to receive a satisfied for the test section. Even with the
14 retroactive application of the July 2000 standards, BellSouth successfully
15 satisfied five (5) of the nine (9) completed categories that have been reported.
16 The five categories that BellSouth received a satisfied rating were: 1) Resale –
17 Ordering; 2) Resale - Maintenance & Repair; 3) Resale – Billing; 4) UNE –
18 Maintenance & Repair, and 5) UNE - Billing. The following paragraphs will
19 demonstrate that BellSouth significantly has improved its overall performance in
20 the remaining four categories (PMR 6-1-2, 6-2-1, 6-2-2, and 6-3-1) since the
21 evaluations were conducted over a year ago. These four categories are
22 currently designated as “not complete” in KPMG’s report. As a result, the
23 previous findings of KPMG should not significantly impact a CLEC’s ability to
24 compete.

1 Q. PLEASE DESCRIBE THE RESALE – PROVISIONING (PMR 6-1-2)
2 COMPARISON INCLUDED WITH THIS REVIEW.

3
4 A. For Category PMR 6-1-2, 14 of the 28 tests were listed as Below Standard in this
5 section. The 14 items are as follows:

- 6 • Items 10, 11, and 13 – These criteria evaluated the Order Completion
7 Interval for Residence Resale in the Non-Dispatch category. BellSouth
8 has determined that these orders were receiving a dispatch interval,
9 instead of the non-dispatch interval they should have received. This issue
10 was addressed in the June 2, 2001 system update and BellSouth currently
11 is assessing the impact of this update. Prior to the system update being
12 implemented, the majority of these orders were being updated on a
13 manual basis, with March 2001 data for Georgia showing a significant
14 improvement to a two (2) day average for the CLECs compared with a one
15 (1) day for BellSouth.
- 16 • Items 15 – 20 compared the Average Jeopardy Notice Interval for
17 Residence and Business Resale to a benchmark of greater than or equal
18 to 48 hours. BellSouth is currently meeting this benchmark in Georgia for
19 March 2001 for all Residence and Business Resale orders. Thus, the
20 Tennessee Regulatory Authority (TRA) should rely on actual commercial
21 usage rather than the test.
- 22 • Items 24 – 26 compared the percent jeopardies for Residence Resale to
23 the BellSouth Residence and Business analog from the July 2000 Order.
24 BellSouth currently is meeting this measurement in Georgia for March
25 2001 with the percentage of Residence orders receiving jeopardies at

0.62% compared with the BellSouth retail analog of 1.32%. Thus, the TRA should rely on actual commercial usage.

- Item 29 is for Residence Resale Dispatch Missed Installation Appointments. BellSouth currently is meeting this measurement in Georgia for March 2001 with the percentage of Residence missed orders at 5.69% compared with BellSouth analog at 12.16%.
- Item 30 compared the Residence Resale Non Dispatched Missed Installation Appointments for the test CLEC in January 2000 with the July 2000 retail analog. While there was only one (1) missed test CLEC order out of 14, the statistical score showed an out of parity condition as a result of the low volume of CLEC orders. In March 2001, in Georgia the comparison was 0.09% for CLEC aggregate and 0.02% for BellSouth. In other words, BellSouth successfully completed over 99.9% of the scheduled orders for all CLECs and BellSouth retail in this category.

Q. PLEASE DESCRIBE THE RESULTS FOR THE UNE – ORDERING COMPARISON (6-2-1) FROM THIS REPORT.

A. For Category PMR 6-2-1, the items in this category with unsatisfactory results (2, 4, 6-9, 16, 17, 19, and 21) were in the Partially Mechanized category. Since February 2000, BellSouth has taken action to improve its performance in this area in order to improve the timeliness and meet the benchmarks of 85% within 24 hours for the average reject interval and 85% within 36 hours for FOC used by KPMG. The following Georgia data for March 2001 shows that BellSouth is meeting KPMG's benchmark for all of these test items.

Reject Interval

<u>Item</u>	<u>Product</u>	<u>March 2001 Data</u>
2	2W Analog Loop-Design	96.34%
4	2W Analog Loop Non-design	No orders
6	Loop + Port Combo	98.32%
7	Switch Ports	No Orders
8	2W Analog INP Loop-Design	No Orders
9	2W Analog INP Loop-Non-Design	No Orders

Firm Order Confirmation

16	2W Analog Loop-Design	98.19%
17	2W Analog Loop Non-design	100%
19	Loop + Port Combo	98.95%
21	Switch Ports	No Orders

Q. PLEASE DESCRIBE THE UNE – PROVISIONING (PMR 6-2-2) COMPARISON INCLUDED WITH THIS REVIEW.

A. For category PMR 6-2-2, KPMG determined that the following items did not meet their criteria:

- Items 22, 23, 25, 26 are OCI comparisons for Non Dispatched orders. A root cause analysis for OCI for Non-Dispatch orders revealed that BellSouth was offering a 0 to 2-day interval on retail non-dispatched POTS orders, but the UNE combination loop and port non-dispatched orders were receiving the same interval as “dispatched” orders. On February 28, 2001, an Interim

1 solution was added to the ordering system that will provide one-day intervals
2 for non-dispatched UNE Combo (Loop & Port) orders for those CLECs placing
3 LSRs through the latest version (Version 9) of the ordering system. Because
4 all CLECs have not converted to Version 9 and because there were orders
5 already pending at the time this solution was implemented, only a partial
6 impact is reflected in the March data. The permanent solution for this
7 problem, a modification to the due date calculation process, was implemented
8 on June 2, 2001 and BellSouth currently is assessing the impact of the system
9 update.

10
11 In addition to the appointment interval issue, OCI is adversely affected by
12 LSRs for which CLECs request intervals beyond the offered interval and do
13 not enter an "L" code on the order. When a CLEC requests an interval
14 beyond the interval offered by BellSouth, the CLEC is supposed to enter an
15 "L" code on the LSR. "L" coded orders are excluded from the OCI metrics.
16 Prior to March, a detailed review of this process indicated that many extended
17 interval orders did not have an "L" code on them and, thus, were being
18 counted in the OCI interval. On February 24, 2001, BellSouth began to add
19 the "L" code to all electronic orders for which a CLEC requested an extended
20 interval but did not have the appropriate code on the LSR.

21
22 The overall order completion interval for Combo (Loop & Port) non-dispatched
23 orders in Georgia in March 2001 is 2.63 days. BellSouth has analyzed March
24 data for this sub-metric by (1) excluding orders that were submitted prior to
25 March 1 and (2) including orders that were submitted via Version 9 of the

1 ordering system. This analysis was done to reflect the full impact of the due
2 date calculator interim solution. 5,669 orders were submitted and completed in
3 March and were processed utilizing the interim solution. For these orders, the
4 average OCI was 1.02 days. Based on these results, BellSouth is confident
5 that the software modifications being made should have a positive impact on
6 the results in this sub-metric.

- 7
- 8 ▪ Items 31 and 40 compare the percent jeopardies for loop and port
9 combinations and analog loops to the BellSouth residence and business
10 analog from the July 2000 Order. The loop and port combinations met the
11 ordered analog in Georgia in March 2001 with the percent jeopardies for
12 the CLEC aggregate at 0.53% compared with the BellSouth retail analog
13 of 1.47%.
 - 14 ▪ Items 42 - 52 compared the Average Jeopardy Notice Interval for loop and
15 port combinations, switch ports, and analog loops to a benchmark of
16 greater than or equal to 48 hours. BellSouth currently is meeting this
17 benchmark for March 2001 for all orders except one in these categories.
 - 18 ▪ Items 53 – 60 are for Missed Installation Appointments for Non-Dispatch
19 orders in the loop and port combinations / switch port areas. In Georgia in
20 March 2001, the comparison was 0.11% for CLEC aggregate and 0.03%
21 for BellSouth. In other words, BellSouth successfully completed over
22 99.9% of the scheduled orders for all CLECs and BellSouth retail in this
23 category.
- 24

The following Georgia March 2001 data shows BellSouth is meeting parity for the majority of these test items.

Order Completion Interval

<u>Item</u>	<u>Product</u>	<u>March 2001 Data</u>
22/23/25	Loop + Port Combo-Non-Design	2.63 CLEC / 1.01 BST
26	Switch Ports Non-Design	No Orders

Jeopardy

31	Loop + Port Combo	0.53% CLEC / 1.47% BST
40	2W Analog Loop Non-Design	10.56% CLEC / 2.46% BST

Jeopardy Notice Interval

42/43	Loop + Port Combo	100%> 48 Hours
44-46	Switch Ports	No Orders
47/48	UNE Other Non-Design	No Orders
49/50	2W Analog Loop Design	100%> 48 Hours
51/52	2W Analog Loop Non-Design	100%> 48 Hours

Missed Installation Appointments

53/56/59	Loop + Port Combo Non-Design	0.11% CLEC/0.03%BST
54/57/60	Switch Ports Non-Design	No Orders

Q. PLEASE DESCRIBE THE RESULTS FOR THE OTHER (BILLING) (PMR 6-3-1) COMPARISON FROM THIS REPORT.

A. Item 1 compared the Usage Data Delivery Completeness for the test CLEC to the regional results for BellSouth. The January 2000 results were approximately

1 1% difference between the test CLEC at 99% and BellSouth retail at 100%. The
2 same difference existed in the February 2000 data but due to the smaller sample
3 size was given an 'at standard' rating. In March 2001, the CLEC aggregate
4 results exceeded the BellSouth retail analog with a 99.5% for the CLEC and
5 99.2% for the BellSouth analog.

6
7 Items 4 – 6 compared the timeliness of the data delivery. This measure tracks
8 the percentage of usage data delivered within six days for both BST retail and
9 the CLEC aggregate. While the CLEC measurement shows less than the fixed
10 critical value, it is only 1% less than the BST retail value. Both measurements
11 show greater than 97.5% delivery timeliness, which provides the CLECs a
12 meaningful opportunity to compete. In exchanging data between local providers
13 for meet point billing and third party billing of end user's calls a benchmark of
14 95% is generally used in the industry to measure performance. BellSouth's CLEC
15 results on this usage measure exceed this generally accepted benchmark.

16
17 Items 7 and 8 compare the average interval for that delivery. March 2001 shows
18 that BellSouth met the performance standard for both the CLECs and the retail
19 analogue.

20

<u>Item</u>	<u>SQM</u>	<u>February 2001 Data</u>
1	Usage Data Delivery Comp	99.49% CLEC / 99.20% BST
4/5/6	Usage Data Delivery Time	97.64% CLEC / 98.66% BST
7/8	Mean Time to Deliver Usage	3.53 day CLEC / 3.51 day BST

25

1 Q. WHAT WOULD BE THE STATUS OF THESE TESTS IF THEY USED MARCH
2 2001 DATA AS THE COMPARISONS?

3
4 A. If all of these tests were rerun with March 2001 data from Georgia as the basis
5 for the results, 37 of the 53 Below Standard tests would be considered At
6 Standard. Those 37 tests would have satisfied the Resale Provisioning (PMR 6-
7 1-2) and UNE Ordering (PMR 6-2-1) sections. Of the remaining 16 tests, 7
8 would be satisfied with the OCI change to the due date calculator and "L" coding
9 on June 2, 2001. These changes would satisfy the UNE Provisioning (PMR 6-2-
10 2) criteria. The Billing section (PMR 6-3-1) would be satisfied with the changes
11 listed above.

12
13 Q. WITH REGARD TO THE KPMG TEST, WHAT DOES YOUR TESTIMONY
14 DEMONSTRATE?

15
16 A. BellSouth believes that the KPMG third party test combined with BellSouth's
17 actual performance data and the modifications to its systems and processes
18 made in connection with the test confirms that BellSouth is providing satisfactory
19 OSS performance. BellSouth passed 98% of the criteria that KPMG tested.
20 Many of the small fraction of deficiencies identified have been addressed by
21 actual commercial usage. In addition, BellSouth has taken the necessary actions
22 to improve performance in those areas where results were unsatisfactory.
23 BellSouth's recent actual performance, as reflected in its performance reports,
24 shows that BellSouth is currently meeting a very high percentage of the

1 benchmarks and standards adopted by the Georgia Commission on these
2 issues.

3

4 Q. DOES THIS CONCLUDE YOUR TESTIMONY?

5

6 A. Yes.

AFFIDAVIT

STATE OF: Georgia
COUNTY OF: Fulton

BEFORE ME, the undersigned authority, duly commissioned and qualified in and for the State and County aforesaid, personally came and appeared David A. Coon –Director – Interconnection Services, BellSouth Telecommunications Inc., who, being by me first duly sworn deposed and said that:

He is appearing as a witness before the Tennessee Regulatory Authority in Docket No. 01-00362 on behalf of BellSouth Telecommunications, Inc., and if present before the Authority and duly sworn, his testimony would be set forth in the annexed testimony consisting of 41 pages and 0 exhibit(s).



David A. Coon

Sworn to and subscribed
before me on 6/21/01



NOTARY PUBLIC

MICHEALE F. HOLCOMB
Notary Public, Douglas County, Georgia
My Commission Expires November 3, 2001